

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.
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Case No.: 1:22-cv-1032 (PKC) (JRC)

**REPLY DECLARATION OF CARLOS
ROA IN FURTHER SUPPORT OF
PLAINTIFF'S AND ROA'S MOTION
FOR ENTRY OF JUDGMENT IN
CONNECTION WITH DEFENDANTS'
FAILURE TO PAY ATTORNEYS' FEES
AND COSTS AS ORDERED BY THIS
COURT IN ITS SEPTEMBER 25, 2024
MEMORANDUM & ORDER**

Carlos Roa declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am the President of Operations at IME WatchDog, Inc. ("IME WatchDog"), the Plaintiff in this case.

2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of documents I maintain at the IME WatchDog office.

3. Based on a public records search, I learned that Defendants Safa Gelardi ("Safa") and Vito Gelardi ("Vito") (Safa and Vito collectively hereinafter the "Defendants") sold their property at 1523 North Hollywood Street, Philadelphia, PA 19121 (hereinafter the "Hollywood PA Property") for \$229,000.00. See [Zillow](#).

4. Based on a similar public records search, there was no mortgage on the Hollywood PA Property.

5. Based on a public records search, Defendants removed the for-sale listing for their 9 Woods End, Lake Harmony, PA property (hereinafter the “Lake Harmony PA Property”) on March 15, 2024, despite stating that they were motivated sellers. See Zillow (“MOTIVATED SELLER WILL PAY \$25,000 TOWARDS UPGRADES TO THE PROPERTY!!”)

6. Public records also reveal that Defendants are defendants in a lawsuit concerning the Lake Harmony PA Property which they are actively defending.

7. As to Defendants’ property at 5265 Milford Rd, East Stroudsburg, PA 18302 (hereinafter the “East Stroudsburg PA Property”), while previously being listed for sale, the listing has been removed from the market since March 2024 through the present.

8. To my knowledge, based on internet research, the East Stroudsburg PA Property is and remains an income-generating short-term rental property consistently for the Defendants, which is rented for \$499.00 per night. See AirBnB.

9. Further, Defendants currently reside at 26118 Crosswood Trails Ln Cypress, TX 77433, a 3,244 square feet luxury home, with a backyard oasis, as depicted and discussed at the July 29, 2024 hearing; this property has never been listed for sale.

10. In addition, Defendants have invested funds to start a daycare called Little Companions. See copy of July 29, 2024 hearing transcript annexed hereto as **Exhibit “A”** at 67:11-24.

11. Public records indicate that Little Companions operates out of 11420 Dairy Ashford Road, Sugar Land, TX 77478 in a commercial development called Ashford Lakes. See copy of publicly available information pamphlet annexed hereto as **Exhibit “B.”**

12. Based on the contents of the pamphlet, it appears that the rent being paid by Little Companions amounts to approximately \$66,000.00 per year or \$5,500.00 per month.

13. Moreover, it appears that Defendants' business is doing so well that they are hiring part-time employees. See advertisements for [part-time cook](#) and [part-time teacher](#).

14. The existence of the day care does not mean that Defendants are out of the IME industry; to the contrary, Defendants are heavily invested in their latest venture, The IME Company, which remains a "Contributing Business Partners" with the Houston Trial Lawyers Association, at an annual cost of \$15,000.00. See Houston Trial Lawyers Association Business Partner [Page](#).

15. As can be seen in all of the foregoing examples, Defendants have brazenly disregarded the Injunction and have violated it with abandon ever since it was issued.


16. To add insult to injury, Defendants have flippantly refused to pay the court Ordered attorneys' fees to both Plaintiff and myself in the amount of at least \$66,457.34, as is evidenced by this Court's September 25, 2024 Order. See ECF Docket Entry [394](#).

17. To this day, the Defendants are still using all of IME WatchDog's trade secrets and confidential information to operate the business they stole.

18. The only way to prevent further violations and Defendants' conduct is to issue a judgment and any other appropriate sanctions consistent with this Court's inherent powers.

19. Plaintiff respectfully requests that this Court grant the relief requested herein, and grant Civil and Criminal contempt charges against the Defendants.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 30, 2024.



Carlos Roa